

From: "Plovnick, Lucy"
Sent: Dec 28, 2017 10:39 AM
To: "MacLean, Matthew J." , "Brian D. Boydston, Esq." , "Olaniran, Greg" , "Harrington, Clifford M." ,
"arnie@lutzker.com"
Subject: RE: 2010-2013 Discovery

Brian and Matt,

We are also unable to commit to a discovery schedule before having the opportunity to receive and review MGC's filings. MPAA agrees with SDC that it makes more sense to revisit this next week after the holiday weekend.

Lucy

Sent with Good (www.good.com)

-----Original Message-----

From: MacLean, Matthew J. [matthew.macleam@pillsburylaw.com]
Sent: Thursday, December 28, 2017 10:22 AM Pacific Standard Time
To: Brian D. Boydston, Esq.; Olaniran, Greg; Plovnick, Lucy; Harrington, Clifford M.;
arnie@lutzker.com
Subject: RE: 2010-2013 Discovery

Brian,

I was out of the office on Saturday, December 23. You may have received my out-of-office auto-reply.

Although you have received a good preview of our written direct statement (and MPAA's, I presume), we have no idea what if anything MGC plans to submit tomorrow. I am therefore unable to commit to such a tight discovery schedule at this time, particularly in light of the upcoming holiday weekend. I suggest we revisit this question next week after we have had a chance to review whatever MGC files and to make some preliminary determinations as to what discovery we may require.

Matt

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From: Brian D. Boydston, Esq. [mailto:brianb@ix.netcom.com]
Sent: Thursday, December 28, 2017 1:05 PM
To: goo@msk.com; lhp@msk.com; Harrington, Clifford M. <clifford.harrington@pillsburylaw.com>; MacLean, Matthew J. <matthew.maclea@pillsburylaw.com>; arnie@lutzker.com
Subject: 2010-2013 Discovery

Dear Counsel, as you may recall, on December 23, 2017, I emailed you regarding a proposed discovery schedule in light of the 12/22/17 order consolidating the 2010-2013 cable/satellite proceedings and continuing the filing dates for the WDS and AWDS a week.

Will you agree to the following revised schedule?

Submission of document requests: January 5, 2018

Response to document requests (objections), and production responsive to document requests: January 12, 2018

Submission of follow-up document requests: January 26, 2018

Response to follow-up document requests (objections), and production responsive to follow-up document requests: January 29, 2018

Again, please inform me whether you agree to the foregoing.

Brian

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Certificate of Service

I hereby certify that on Wednesday, February 07, 2018 I provided a true and correct copy of the Exhibit B to Response in Opposition on Settling Devotional Claimants' Motion to Quash Discovery Requests of Multigroup Claimants to the following:

Broadcast Music, Inc. (BMI), represented by Jennifer T. Criss served via Electronic Service at jennifer.criss@dbi.com

MPAA-Represented Program Suppliers (MPAA), represented by Gregory O Olaniran served via Electronic Service at goo@msk.com

Canadian Claimants Group, represented by Victor J Cosentino served via Electronic Service at victor.cosentino@larsongaston.com

Settling Devotional Claimants (SDC), represented by Arnold P Lutzker served via Electronic Service at arnie@lutzker.com

National Public Radio (NPR), represented by Gregory A Lewis served via Electronic Service at glewis@npr.org

Spanish Language Producers, represented by Brian D Boydston served via Electronic Service at brianb@ix.netcom.com

SESAC, Inc., represented by John C. Beiter served via Electronic Service at jbeiter@lsglegal.com

Major League Soccer, LLC, represented by Edward S. Hammerman served via Electronic Service at ted@copyrightroyalties.com

Joint Sports Claimants (JSC), represented by Ritchie T. Thomas served via Electronic Service at ritchie.thomas@squirepb.com

American Society of Composers, Authors and Publishers (ASCAP), represented by Sam Mosenkis served via Electronic Service at smosenkis@ascap.com

Public Broadcasting Service (PBS) and Public Television Claimants (PTC), represented by Ronald G. Dove Jr. served via Electronic Service at rdove@cov.com

Broadcaster Claimants Group (BCG) aka NAB aka CTV, represented by David J Ervin
served via Electronic Service at dervin@crowell.com

Signed: /s/ Brian D Boydston